

May 9, 1999

Tom Younker
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Decatur, GA 30033

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Rm. 1061
Rockville, MD 20852

9130 '99 MAY 13 P1:54

RE: Docket # 98N-1038 "Irradiation in the production, processing and handling of food"

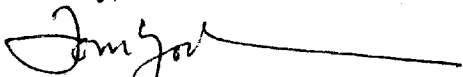
Dear Reader:

Consumers have an inherent right to make informed food choices. That can only be accomplished with sufficient and accurate labeling. If any ingredients have been exposed to radiation, then the packaging shall be prominently labeled with the unambiguous term "irradiation" or "irradiated", together with the radura symbol. Alternative terms are simply misleading and should not be permitted.

1. The current labeling *does* convey meaningful information to the consumer in a useful manner.
2. The current labeling is *not* alarming, but does alert to consumer to additional processing that is not likely to be apparent.
3. Consumers *would certainly be mislead by the absence of a disclosure statement.* The process of irradiation alters the food in multiple and significant ways: texture, taste, chemical constitution, storage life, and nutrient profile. To hide this fact from the consumer would be an act of deception, suitable for neither a governmental agency nor a corporation.
4. Consumers *are also mislead by the absense of a disclosure statement on processed foods containing irradiated ingredients,* for the same reasons as #3 in proportion to the irradiated ingredient. Does adding 10% soy to hamburger meat make the irradiation of the 90% of less interest ? NO.
5. *Labeling requirements should not expire.* The reasons above continue to apply, and consumers continue to have a right to make informed choices.

Your responsibility to the public is clear: retain the requirements for clear and prominent labeling. Moreover, if any ingredient has been irradiated, the prepared food should be so noted.

Sincerely,



Tom B. Younker

98N-1038

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20837-0001

